

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AVIDYNE CORPORATION,

Plaintiff,

v.

L-3 COMMUNICATIONS AVIONICS
SYSTEMS, INC., f/k/a B.F. GOODRICH
AVIONICS SYSTEMS, INC.,

Defendant.

C.A. No. 05-11098 GAO

JOINT MOTION TO EXTEND DEADLINE TO PRODUCE DOCUMENTS

Despite the parties' good faith efforts to comply with the October 16th deadline for document discovery, as set forth in this Court's September 11, 2006 Order, neither of the parties will be able to complete their document productions by this date. In particular, Plaintiff Avidyne Corporation ("Avidyne") has completed its collection of its electronic data, negotiated appropriate search terms with Defendant L-3 Communications Avionics Systems, Inc. ("L-3") in order to process that data, and has completed a substantial portion of its review of these and other hard copy documents. Similarly, L-3 is completing its search for electronic and hard copy documents, and its review of the same. However, neither party will have completed this collection and review by the current deadline for document discovery.

Accordingly, the parties jointly request that this Court extend the deadline for document discovery by three weeks, until November 6, 2006, in order to give the parties additional time necessary to finish their collection, review, and production of documents relevant to this litigation and responsive to the parties' respective document requests.

The parties have agreed to produce documents on a “rolling” basis in during this time period, so that document production will continue between the date of this motion and the proposed extended deadline.

WHEREFORE, Plaintiff and Defendant collectively request that this Court grant this Joint Motion, and extend the deadline for document discovery until **November 6, 2006**.

Dated: October 14, 2006

AVIDYNE CORPORATION

By its attorneys,

/s/ Maia H. Harris

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**L-3 COMMUNICATIONS AVIONICS
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By its attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October, 2006, I caused a courtesy copy of the within document to be served via electronic mail on:

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/s/ Maia H. Harris